

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

FORTRESS VALUE RECOVERY FUND I, LLC	)	CASE NO. 1:11-CV-00200
	)	
Plaintiff,	)	JUDGE JAMES S. GWIN
	)	
v.	)	
	)	
COLUMBUS COMPONENTS GROUP, LLC, CCG HOLDINGS, LLC, PJ MANAGEMENT GROUP, LLC, HAWTHORN MANUFACTURING CORPORATION, and PATRICK JAMES	)	<b><u>MOTION TO CHANGE DATE</u></b>
	)	<b><u>OF CASE MANAGEMENT</u></b>
Defendants.	)	<b><u>CONFERENCE</u></b>

Defendants, Columbus Components Group, LLC, CCG Holdings, LLC, and PJ Management Group, LLC (“Movants”), through their undersigned counsel, hereby move this Court to change the date for the Case Management Conference which is presently scheduled for April 8, 2011 at 10:30 a.m. The grounds for this motion are as follows:

1. The undersigned, Patrick J. Keating, will be the lead trial counsel in this action for the Movants.
2. This Court’s Case Management Conference Scheduling Order requires the attendance of lead counsel for the Case Management Conference.
3. Attorney Keating is presently scheduled to be in the Canton Bankruptcy Court for a contested confirmation hearing in the Chapter 11 bankruptcy case of *In re Seniah Corp.*, Case No. 10-60620. The Bankruptcy Court had previously scheduled April 7 and 8 for the confirmation hearing. See, Exhibit A.

4. Attorney Keating can make himself available at any time on the dates of April 12, 13, 14 and 15 of the following week. Thus, the continuance sought herein is only for a few days.

5. Attorney Keating has spoken with Pete Elliott, lead trial counsel for Defendants Hawthorn Manufacturing Corporation and Patrick James, and Mr. Elliott has indicated that he has no objection to such a continuance. Attorney Keating has also spoken with Scott Balber, one of the attorneys for Plaintiff Fortress Value Recovery Fund I, LLC, and he also has no objection to such a continuance.

WHEREFORE, Movants respectfully move this Court to continue the date set for the Case Management Conference to a date on the following week, or such other time as the Court may determine.

Respectfully submitted,

BUCKINGHAM, DOOLITTLE & BURROUGHS, LLP

By: /s/ Patrick J. Keating

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*Attorneys for Defendants Columbus Components  
Group, LLC, CCG Holdings, LLC, and PJ  
Management Group, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing was filed electronically this 21<sup>st</sup> day of March, 2011 and that a copy of the foregoing was served upon all parties in this case by operation of this Court's electronic filing system.

/s/ Patrick J. Keating

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